



STATE OF IDAHO

DEPARTMENT OF HEALTH
AND WELFARE

DIVISION OF ENVIRONMENT
Statehouse
Boise, Idaho 83720

ID 0961
6.12.86
4a

RCRA COMPLIANCE INSPECTION REPORT

Date of Inspection:

June 12, 1986

Facility:

ARRCOM, Inc.

EPA Identification No.:

IDD000800961

Address:

Five miles east of Stateline
Highway 53
Rathdrum, ID 83858

Report Prepared By:

Kathryn Sewell
Sr. Hazardous Materials Specialist
Division of Environment (DOE)
Idaho Department of Health & Welfare (IDHW)

Inspection Participants:

Kathryn Sewell, IDHW/DOE

Background Information:

ARRCOM, Inc. submitted a Part A RCRA Application to EPA on November 17, 1980 for on-site storage, treatment, and/or disposal of hazardous waste. The facility initially qualified for interim status under RCRA to store and treat ignitable hazardous waste and spent solvents. On June 20, 1982, an inspection conducted by the EPA at the facility found that hazardous waste or hazardous waste constituents had been spilled and/or disposed of on-site.

An EPA Complaint and Compliance Order issued on April 27, 1983, required ARRCOM, Inc. to submit a Part B RCRA Permit

RCRA Compliance Inspection Narrative Report - 1

EQUAL OPPORTUNITY EMPLOYER

USEPA RCRA



3009285

Application within 180 days of their receipt of the Order. On May 27, 1983, the facility owner submitted a letter to EPA stating that the facility was not to be used for the handling of hazardous waste in the future. The letter also clarified the intention of the facility owner not to submit a RCRA Part B Permit Application. At that time, EPA proposed to terminate interim status for the facility. The period for public comment in regards to termination of interim status began on May 18, 1984 and ended on July 2, 1984.

On August 7, 1985, EPA again threatened ARRCOM, Inc. with termination of interim status unless the facility: a) applied for a final determination regarding the issuance of all required permits by November 8, 1985; or b) certified that such facility was in compliance with all applicable groundwater monitoring and financial responsibility requirements. ARRCOM has not complied with either option. As of June 12, 1986, the EPA has not followed up on the proposal to terminate interim status.

ARRCOM has been the site of limited Superfund activity and is on the Superfund's National Priorities List (NPL). On July 20, 1982, samples were collected under a joint TSCA/RCRA/Clean Water Act (CWA) inspection. Contaminated soil and material from some of the tanks was collected. The analysis showed soil contamination and some PCBs. The site was declared an immediate threat to the public health and welfare because: 1) the proximity to the Spokane Valley/Rathdrum Prairie aquifer 2) the high possibility of groundwater contamination, 3) adverse health effects of some of the chemical contaminants present on-site, 4) the abandoned nature of the site and 5) the deteriorated condition of a number of the tanks. A Federal Immediate Removal Action was declared by the EPA Regional Administrator on August 31, 1983. Cleanup operations commenced on September 18, 1983, and were completed on September 21, 1983. The tank containing PCB contaminated material was pumped empty and rinsed with kerosene four times. The 23 other bulk storage tanks and 3 tank trucks were emptied into vacuum trucks and tank trucks and 137 cubic yards of contaminated soil were removed.

A letter from the EPA Region X office, dated March 19, 1985, notified the State of a proposed Superfund project. The project consisted of a remedial investigation and feasibility study (RI/FS) for the site. Community relations activities would be conducted as part of the project. The proposal was never approved because the RCRA section decided to pursue enforcement actions against the owners.

RCRA inspections were conducted on July 20, 1984, by the Boise Operations office and August 28, 1985, by the IDHW/DOE. Both reports indicated that the facility was out of compliance with almost every aspect of the hazardous waste rules and regulations.

Results:

The ARRCOM facility is in violation of all applicable RCRA interim status requirements. There was no site security; no signs posted to deter entry; no records on weekly inspections, personnel training, emergency preparedness, Contingency Plan; no evidence of groundwater monitoring; and several tanks were leaking onto the ground. The site has been totally abandoned without regard to public health and the environment.

Recommendations:

ARRCOM has been abandoned since January 1982 and has been out of compliance with all applicable interim status requirements since that time. The site is located above the Spokane Valley/Rathdrum Prairie aquifer which is a sole source aquifer that provides drinking water for about 350,000 people in the region. The site has ranked high enough to be included on Superfund's National Priorities List (NPL) indicating a high potential for threat to human health and the environment. It is recommended that the State pursue actions that result in:

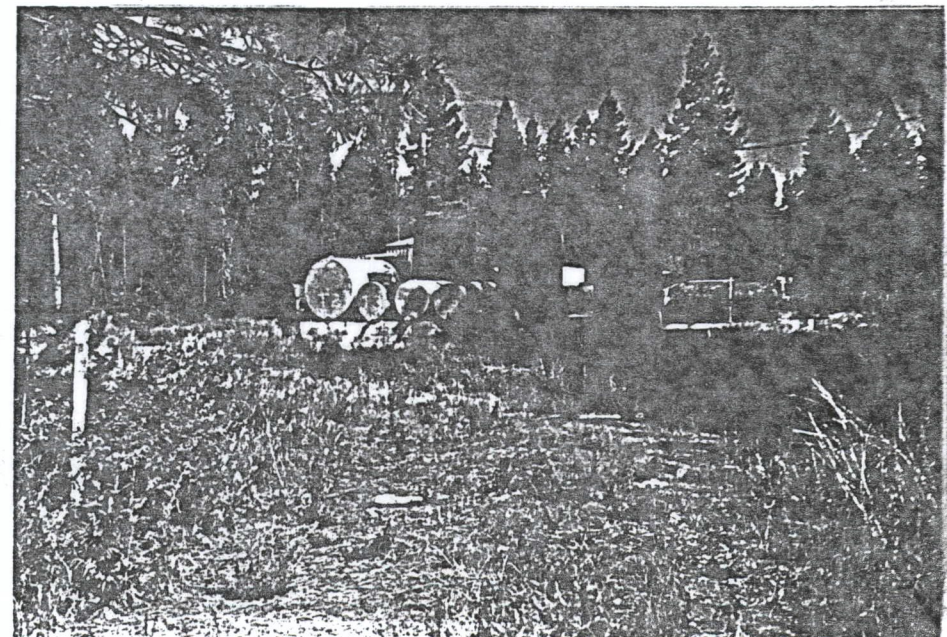
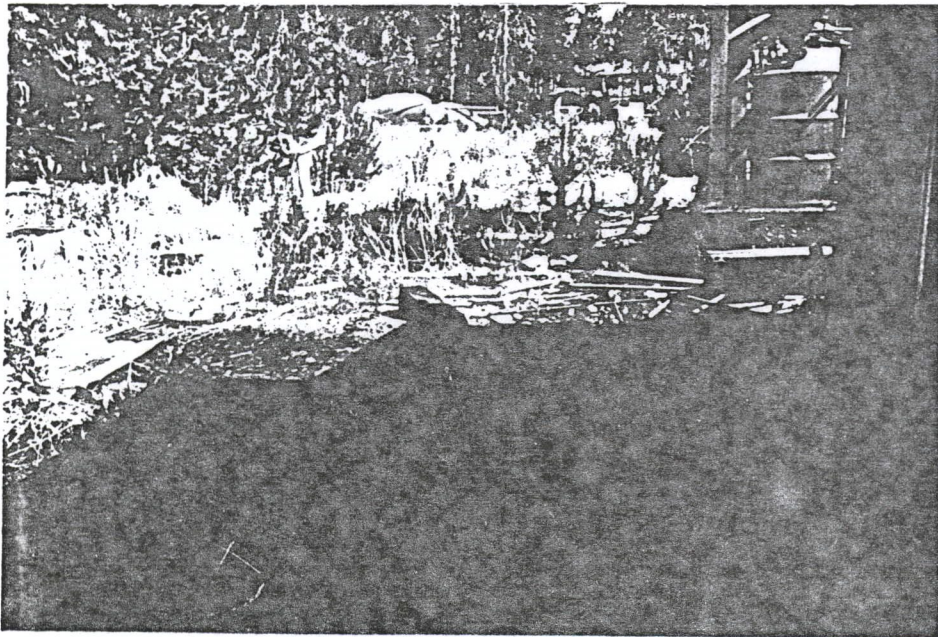
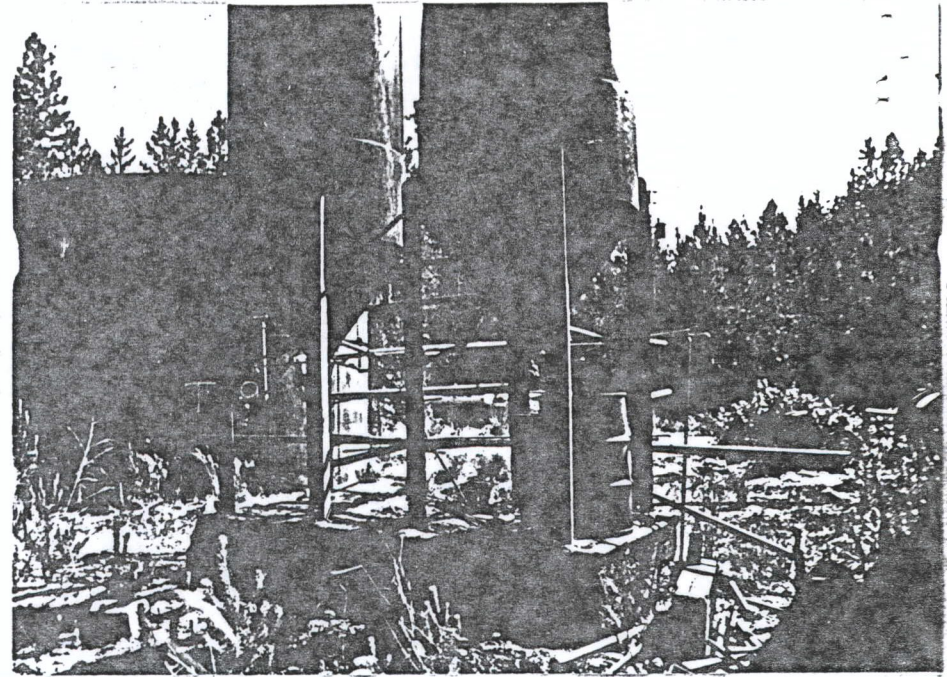
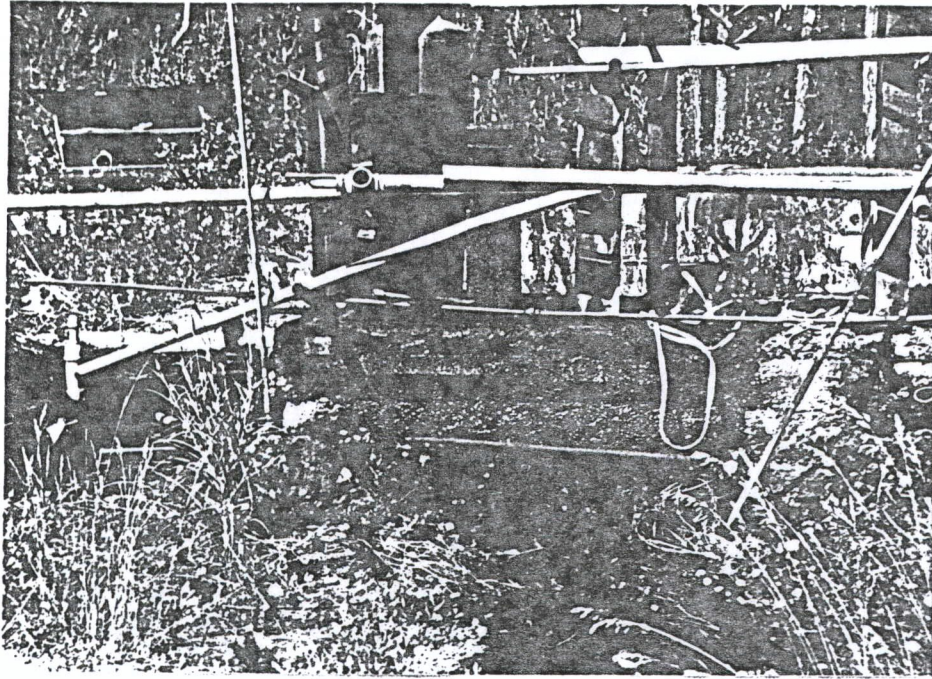
- 1) EPA Region X terminating RCRA interim status for the facility.
- 2) The Superfund program conducting an RI/FS and proceed with monitoring and cleanup of the site, with the State as the lead agency.

Kathryn Sewell

Kathryn Sewell
Sr. Hazardous Materials Specialist

Attachments: RCRA Inspection Checklist
Site Location Map
Site Sketch
Photographs

K. Sewen, HAW/DOE



Arrcom, Inc.
Rathdrum, ID

IDD000800961

June 12, 1986 K. Sewell, IDHW/DOE

photo of treatment tanks and stained soil
underneath

→ E

Arrcom, Inc.
Rathdrum, ID

IDD000800961

June 12, 1986 K. Sewell, IDHW/DOE

overall view of site from the south
looking north - note no barriers to
prevent access to site

Arrcom, Inc.
Rathdrum, ID

IDD000800961

June 12, 1986 K. Sewell, IDHW/DOE

photo of area below treatment tanks, note
black oily material staining soil and
concrete

→ W

Arrcom, Inc.
Rathdrum, ID

IDD000800961

June 12, 1986 K. Sewell, IDHW/DOE

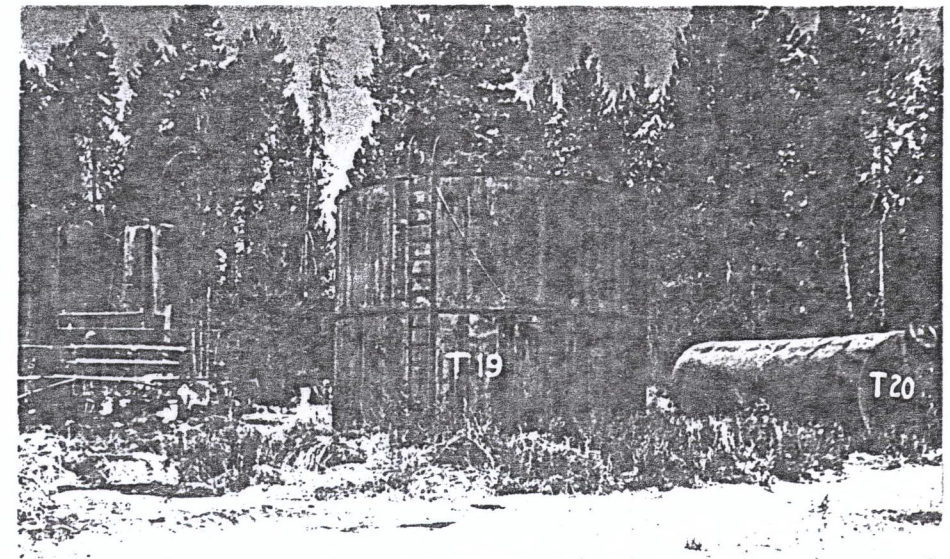
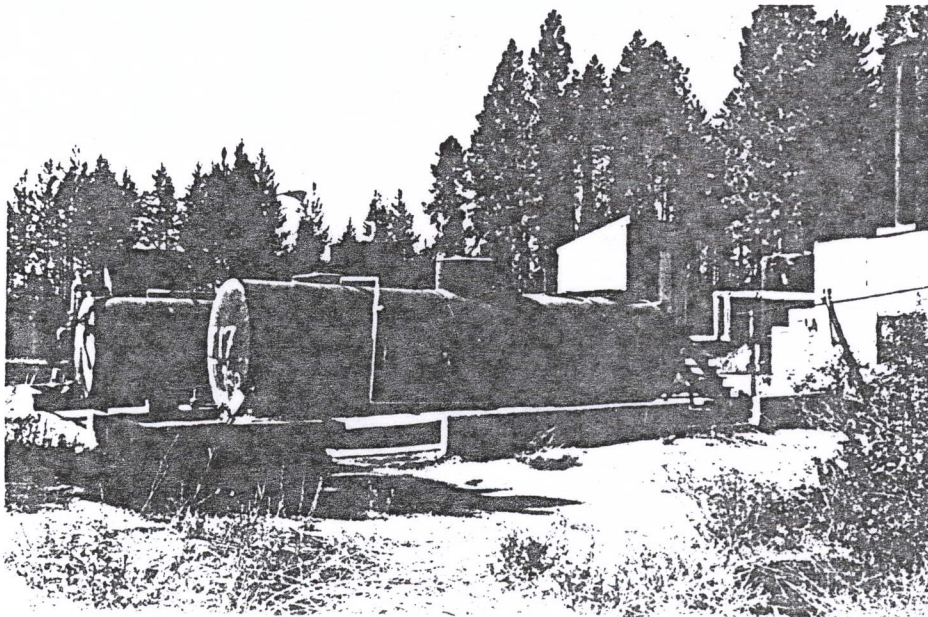
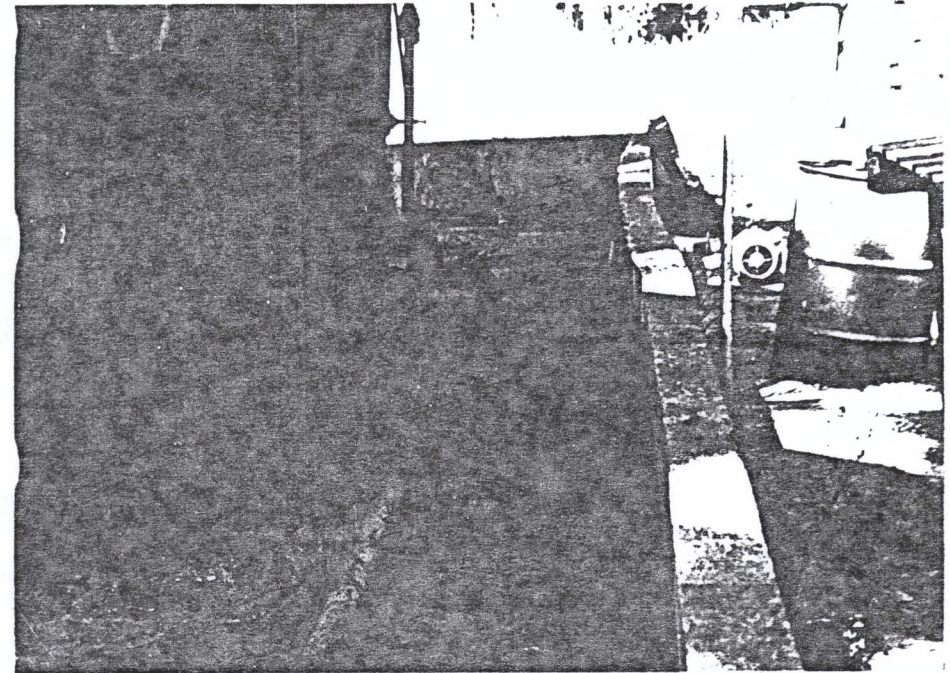
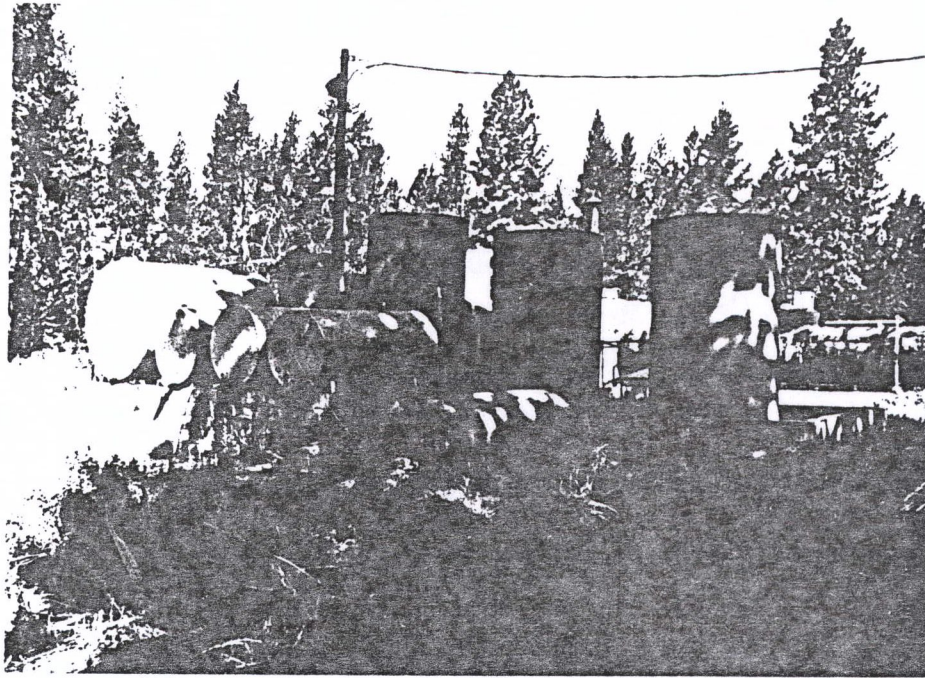
photo of western edge of boiler room - soil
is stained w/ black oily material

→ N

1111

1111 1111 1111

K-Sewell 1111 1111 1111



Arrcom, Inc.
Rathdrum, ID

IDD000800961

June 12, 1986

K. Sewell, IDHW/DOE

photo of base of tanks T9 and T8, note
stained area caused by leak
photo taken of N side of tanks

→ W

Arrcom, Inc.
Rathdrum, ID

IDD000800961

June 12, 1986

K. Sewell, IDHW/DOE

photo of T19 (waste oil storage), T20 (waste oil
storage) and the treatment tanks on left
side of photo

→ N

Arrcom, Inc.
Rathdrum, ID

IDD000800961

June 12, 1986

K. Sewell, IDHW/DOE

view of tanks T2, T3, T4, and T5 in
foreground, and taller ones T8, T9, and
T10 in background

→ NW

Arrcom, Inc.
Rathdrum, ID

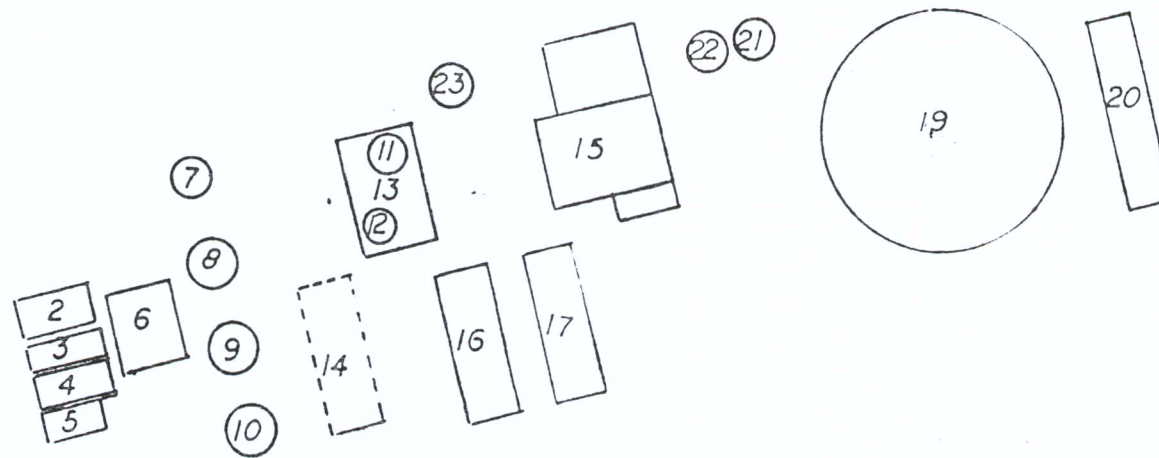
IDD000800961

June 12, 1986

K. Sewell, IDHW/DOE

photo of tanks T16 and T17

→ S



210'

241'

147'

WASTE OIL PROCESSING PLANT
DREXLER ENTERPRISES INC.
RAITHRUM, IDAHO

1. Water well
2. T-48 2,000 Gal. Re-refined oil
3. T-23 1,000 Gal. Re-refined oil
4. T-24 1,000 Gal. Re-refined oil
5. T-11 550 Gal. Re-refined oil
6. Electrical storage
7. T-47 2,000 Gal. Water separator
8. T-145 6,000 Gal. Finished oil storage
9. T-120 5,000 Gal. Finished oil storage
10. T-119 5,000 Gal. Finished oil storage
11. T-28 1,200 Gal. Electric heater tank
12. 48" shaker
13. Shaker building
14. T-144 6,000 Gal. Underground finished oil
15. Boiler room with work shop
16. T-142 6,000 Gal. Heater tank with coils
17. T-143 6,000 Gal. Heater tank with coils
18. Truck loading rack
19. T-1071 45,000 Gal. Waste oil storage
20. T-238 10,000 Gal. Waste oil storage
21. U-1 1,200 Gal. Treatment tanks
22. U-2 1,200 Gal. Treatment tanks
23. T-71 3,000 Gal. Fuel storage

RESOURCE CONSERVATION AND RECOVERY ACT (RCRA)

Region 10 Inspection Checklist

Purpose--This checklist is designed to serve as a guideline to the major points of the regulations adopted pursuant to RCRA for inspectors to use while visiting hazardous waste (HW) regulated facilities. This checklist should not serve as a substitute for a detailed knowledge of the relevant regulations. The following is the outline of the checklist.

- I. General Information
- II. Small Quantity Generator (SQG) Regulations (40 CFR 261.5)
- III. Generator Regulations (40 CFR 262)
- IV. Transporter Regulations (40 CFR 263)
- V. Treatment, Storage, and Disposal (TSD) Interim Status Regulations (40 CFR 265)
- VI. Treatment, Storage, and Disposal (TSD) Permit Status Regulations (40 CFR 264)

I. General Information (Date Revised March 8, 1983)

A. Inspection: Type of Inspection: Evaluation (☒); Sampling ();
Record Review (☒); Special (); Follow-up;
Date/Time Inspection commenced: June 12, 1986

B. Facility

EPA/State ID D0000800961

Name & Addresses Arrcom Incorporated

1. Mailing: P.O. Box 125, Otis Orchards, WA, 99027

2. Location: 5 miles E. of State line Hwy. 53
Rathdrum, ID

Contact: none

Telephone: () none

C. Compliance Summary

	<u>IN</u>	<u>OUT</u>	<u>N/A</u>
RCRA (Statute)	()	(<input checked="" type="checkbox"/>)	()
40 CFR 270	()	(<input checked="" type="checkbox"/>)	()
40 CFR 124	()	()	()
40 CFR 261.5	()	(<input checked="" type="checkbox"/>)	()
40 CFR 262	()	()	(<input checked="" type="checkbox"/>)
40 CFR 263	()	()	(<input checked="" type="checkbox"/>)
40 CFR 264 (Permit)	()	()	(<input checked="" type="checkbox"/>)
40 CFR 265	()	(<input checked="" type="checkbox"/>)	()

Specific Violations: in violation of all interim
status regulations

D. Inspector

Name (Print) Kathryn Sewell Title: Senior Hazardous materials specialist
Signature Kathryn Sewell
Organization Dept. Health & Welfare / Div. of Environment
Phone (208) 334-5879

E. Inspection Participants:

<u>Name</u>	<u>Title</u>	<u>Phone #</u>
<u>Kathryn Sewell</u>	<u>IDHW/DOE</u>	<u>(208) 334-5879</u>

F. Notification/Permit Information

1. Started operation: _____ Date: _____
2. Notification filed: YES NO Date: _____
3. Part A application filed: (YES) NO Date: 11/17/80
4. Part B called/Date Due (YES) NO Date: 4/27/83
5. Part B application: YES (NO) Date: _____
6. Changes in Notification or Part A: facility notified EPA on 5/27/83 of intention not to submit Part B - EPA threatened to deny terminate interim status
7. Facility's classified as:

Generator	()
Transporter	()
Treatment facility	()
Storage facility	()
Disposal facility	()
Small quantity generator	()
Recycler	()
Less than 90 day storage	()
Wastewater treatment unit exemption (WWTU)	()
Elementary neutralization unit exemption (ENU)	()

8. Does facility have a Part A withdrawal request in ?
YES (NO)

Status _____

Comments: site abandoned in January 1982

G. Hazardous Waste Generation (HW) and Management (List EPA Waste Code)

1. General information

a. Characteristic HW (DXXX)?

- (1) Ignitability _____
- (2) Corrosivity _____
- (3) Reactivity _____
- (4) EP Toxicity _____

b. Listed HW?

(1) HW from non-specific sources (FXXX)
F003, F005

(2) HW from specific sources (KXXX)

c. Discarded commercial chemical product (PXXX or UXXX)

- (1) PXXX _____
- (2) UXXX _____

d. Has facility petitioned to delist waste? YES ☒ NO

Date: _____ Comments: _____

e. Does facility qualify for WWTU or ENU? YES ☒ NO

Comments: _____

f. Has a determination been made for each waste generated that it is or is not a RCRA hazardous waste? unknown

(1) What are the wastes generated? unknown except as listed above

(2) How was the hazardous waste determination made for each waste (i.e., lab analyses, knowledge of waste streams or processes, waste listed in Part 261)? unknown

Comments: facility abandoned in January 1982

(3) Are records available on the determination(s)?

YES ☒ NO

(4) Are all hazardous wastes noted during inspection listed on the facility's RCRA notification/ Part A application?

YES

NO

unknown

If so explain.

2. Specific information

Provide the following information for each of the individual HW streams listed above. (Complete a separate form for each HW.)

- a. EPA HW Code
- b. HW description
- c. Composition (including sampling requirements)
- d. Process producing waste:
- e. Rate of waste production
- f. Time of storage
- g. Waste handling prior to disposal
- h. Waste disposal practice and manifest
- i. Reporting and recordkeeping
- j. Comments

H. Miscellaneous Notes:

waste was leaking onto the ground

no one present on site during inspection

V. TREATMENT, STORAGE and DISPOSAL (TSD) Interim Status Regulations
Facilities, 40 CFR 265. (Date Revised March 8, 1984)

A. Type of Activity

1. Storage

- a. Containers ()
- b. Tanks ()
 - (1) Above ground ()
 - (2) Below ground ()
- c. Surface Impoundments ()
- d. Waste Piles ()
- e. Other ()

2. Treatment

- a. Settling ()
- b. Evaporation ()
- c. Filtration ()
- d. Energy Recovery ()
- e. Incineration ()
- f. Thermal Treatment ()
- g. Recycling/Recovery ()
- h. Chem/Phys/Biological ()
- i. Other ()

3. Disposal

- a. Landfill ()
- b. Land Treatment ()
- c. Surface Impoundment ()
- d. Incineration ()
- e. Other ()

4. Comments: *facility qualified for interim status as storage
treater of ignitable hazardous wastes and spent solvents*

5. Are hazardous wastes accepted from "outside" (off-site) sources (wastes not generated on site)? YES NO

unknown

a. If YES, has a chemical and physical analysis of a representative sample been obtained in accordance with 40 CFR 265.13? YES NO

b. Does the facility confirm that each hazardous waste received at the facility matches the identity of the waste on the manifest? YES NO

facility abandoned

c. How does the facility determine this?

B. Subpart B - General Facility Standards (40 CFR 265.10 - 265.17)

1. Does the facility obtain a detailed analysis of his waste prior to storing, treating, or disposing of it? YES ☒ NO

Describe: *no records available on site*

2. Does the facility follow a Written Waste Analysis Plan
Does the Plan include? *facility abandoned*

- a. Parameters to be tested? YES ☒ NO
b. Methods of analysis? YES ☒ NO
c. Methods to get representative samples? YES ☒ NO
d. Testing frequency? YES ☒ NO

Comments:

3. Did inspector collect a copy of the Plan for a thorough review of it at EPA's offices? YES ☒ NO

4. Security

- a. Have site owner/operators taken appropriate measures to ensure against unauthorized entry? YES ☒ NO

- (1) Are signs posted at each entrance to active portion, and at other locations, in sufficient numbers to be seen by any approach? YES ☒ NO

- (2) Are they legible from a distance of 25 feet or more? YES ☒ NO

- (3) Does the facility have a 24-hour surveillance system or artificial or natural barrier/or combination of both, to control access to the active portion? YES ☒ NO

Comments:

absolutely no site security

5. Does the facility follow a Written Inspection Schedule (40 CFR 265.15)? *facility abandoned* YES ☒ NO

- a. Does it include inspecting all:
Monitoring equipment? YES ☒ NO
Safety and emergency equipment? YES ☒ NO
Security devices? YES ☒ NO
Detecting equipment? YES ☒ NO

Dangerous waste storage areas?

YES ☒ NO

b. Is this inspection schedule maintained at the facility?

YES ☒ NO

c. Is an inspection log maintained?

YES ☒ NO

(1) Is the log, or its summary, kept at the facility for at least three years from the date of inspection? *no records available* YES ☒ NO

(2) Does the log include:

(a) date of time of inspection? YES ☒ NO

(b) inspectors name? YES ☒ NO

(c) observations? YES ☒ NO

(d) date and nature of repairs? YES ☒ NO

Comments:

*no records available
site abandoned*

6. Personnel Training (40 CFR 265.16)

a. Has a training program been developed? YES ☒ NO
What Type? (Classroom/on-the-job)

b. Does the program include contingency plan and response training? YES ☒ NO

c. Does the program include measures to familiarize personnel with emergency response equipment, procedures, and systems including: YES ☒ NO

(1) Procedures for using and maintaining equipment? YES ☒ NO

(2) Key parameters for automatic waste feed cut-off systems. YES ☒ NO

(3) Communications or alarm equipment YES ☒ NO

(4) Response to fire and explosions YES ☒ NO

(5) Response to ground water contamination incidents? YES ☒ NO

(6) Facility shut down? YES ☒ NO

d. Are records available at the facility for the following:

- (1) Job title for each position related to hazardous waste management and maintaining equipment? YES ☒ NO
- (2) Written job description for each job title? YES ☒ NO
 - (a) Does the job description include the skill, education or qualifications required for the position? YES ☒ NO
 - (b) The duties assigned to that position? YES ☒ NO
- (3) A written description of the type and amount of training to be given to those in each job position? YES ☒ NO
- (4) A record of training completed or experience obtained for each job position by employee? YES ☒ NO
- (5) Was the required training obtained within 6 months of employment or by May 19, 1981, by each individual involved in hazardous waste management activities? YES ☒ NO

C. Subpart C - Procedures and Preventions (40 CFR 265.30)

1. Is facility maintained and operated to minimize the hazards of fire, explosion, and sudden or non-sudden releases to the environment?

YES ☒ NO

Explain: *facility abandoned with no regard to potential for fire, explosion, or releases to the environment*

2. Is internal emergency communication equipment or alarm systems installed?

YES ☒ NO

What type? *none*

3. Is a device (e.g., telephone) immediately available for summoning emergency assistance?

YES ☒ NO

4. Are fire extinguishers or other emergency equipment immediately available on-site?

YES ☒ NO

5. Is emergency communications and response equipment tested?

YES ☒ NO

How often?

6. Is aisle space adequate for emergency response?

YES ☒ NO

What is the aisle spacing?

7. Have any arrangements been made with local emergency response organizations?

YES ☒ NO

8. Which organizations?

9. If local organizations have declined to enter into response agreements, is this documented in the facility's operating record?

YES ☒ NO

Explain: *facility abandoned in January 1982*

D. Subpart D - Contingency Plan and Emergency Procedures 40 CFR
265.50

1. Has contingency plan been developed?
(It may be a modified SPCC plan) YES ☒ NO
2. Have incidents occurred where the plan
has been implemented? YES ☒ NO
3. Have incidents occurred where the plan
should have been implemented but was not ☒ YES NO
Explain tanks leaking waste onto ground
4. A copy of the plan should either be
obtained for post-inspection office
review or it should be examined during
inspection for the following:
 - a. Does the plan describe actions to
be taken by personnel in response to
fire, explosion, or releases to the
environment? YES ☒ NO
 - b. Does the plan describe arrangements
made with external emergency response
organizations? YES ☒ NO
 - c. Does the plan list those qualified to
act as emergency coordinator including
their name, address, and phone? YES ☒ NO
 - (1) Is the list current? YES ☒ NO
 - d. Is all emergency equipment available at
the facility listed in the plan? YES ☒ NO
 - (1) Is the location and a description of
the equipment included? YES ☒ NO
 - (2) Are capabilities described for each
piece or equipment unit? YES ☒ NO
 - e. Does the plan include evacuation proce-
dures including a description of signals to
initiate evacuation (and routes and
alternative routes)? YES ☒ NO

- f. Is a copy of the plan maintained at the active facility (versus main office)? YES ☒ NO
- (1) Has a copy been supplied to appropriate off-site emergency response organizations?
To which? YES ☒ NO
5. Is at least one designated person always available to respond to emergencies (i.e., of those on the coordinator list)? YES ☒ NO
How are they available
no one available
6. What are the limits of this person's authority to respond to emergencies?
- a. Has an emergency occurred? YES NO
unknown
- b. Was the plan implemented? YES NO
unknown
- c. (Describe the incident)

E. Subpart E - Manifest System, Recordkeeping, and Reporting 40
CFR 265.70

1. Manifest System

a. Upon receipt of a manifested hazardous waste shipment, does the TSD facility:

(1) Sign and date each copy of manifest receipt of certifying waste? YES NO

(2) Note any discrepancies on each copy? YES NO

(3) Give delivering transporter one signed and dated copy of the manifest? YES NO

(4) Send a S/D copy of the manifest to the generator within 30 days after delivery and? YES NO

(5) Retain a copy of each manifest at the facility for 3 years from delivery? YES NO

b. If the TSD facility initiates a hazardous waste shipment, does it comply with generator requirements in Part 262? YES NO

c. Does the TSD facility examine manifests and wastes received to detect any significant discrepancies in quantity or type of waste, such as: YES NO

(1) Bulk waste-quantity variation of 10 percent or greater

(2) Batch waste - any variation in piece count

(3) Waste type - obvious differences discernible by inspection or waste analysis

d. If significant discrepancies are found, does the TSD facility:

(1) Reconcile discrepancies with generator or transporter within 15 days? or YES NO

*unknown
no records
available*

- (2) Immediately submit to EPA-RA a Discrepancy Report describing the discrepancy and attempts to resolve it and a copy of the manifest involved?

YES NO

unknown

- e. TSD facilities must keep a written operating record documenting the following details: *no records available*

- (1) Waste description and quantity received
- (2) Methods and dates of its treatment, storage, and disposal
- (3) The location and quantity of each HW at the facility

2. Operating Record

- a. Does the owner/operator of the facility maintain an operating record at the facility (40 CFR 265.73)? YES ☒ NO
- b. Does the record contain the following information.
- (1) A description of, and the quantity of each HW received, and the method(s) and date(s) of its treatment, storage, or disposal at the facility? YES ☒ NO
- (2) The location of each Hazardous Waste within the facility, and its quantity? YES ☒ NO
- (3) A map showing disposal sites? YES ☒ NO
- (4) Summary reports and details of all incidents that require implementing the Contingency Plan? Yes ☒ NO
- (5) Records and results of inspections as required (need only be kept three years)? YES ☒ NO
- (6) All closure and post-closure cost estimates required for the facility? YES ☒ NO
- (7) The results of testing and waste analysis? YES ☒ NO

3. Facility Reporting Procedures

- a. Has the owner/operator prepared and submitted a single copy of the Annual Report to EPA by March 1 of each year? YES ☒ NO
- b. Is owner/operator familiar with procedures for emergencies? YES ☒ NO
- c. If a TSD facility accepts a regulated hazardous waste shipment without the required manifest or shipping paper, does it file an "Unmanifested Waste Report" within 15 days of receipt? YES ☒ NO

no records available

facility abandoned in January 1982

F. Subpart F - Ground-Water Monitoring (40 CFR 265.90)

1. Are ground-water (GW) monitoring regulations required at this facility? ☒ YES ☐ NO

2. If YES, what is the relevant process unit?

- a. Surface impoundment ☐
 - b. Waste pile ☒
 - b. Land treatment ☒
 - c. Landfills ☒
 - d. Other ☐
- Describe:

3. Has the owner/operator implemented a ground water monitoring plan? YES ☒ NO

4. If NO, has the facility implemented one of the following: NO

- a. GW Waiver [265.90(c)] ☐
- b. Alternate GW Monitoring System [265.90(d)] ☐
- c. Neutralization Waiver (265.90(e)) ☐
- d. Describe:

5. Does the ground water monitoring program consist of the following:

- a. At least 1 upgradient and 3 downgradient wells? YES ☒ NO
- b. GW Sampling and Analysis Plan YES ☒ NO
- c. GW sampling quarterly first year YES ☒ NO
- d. GW sampling semiannually after that YES ☒ NO
- e. Drinking Water Standards parameters YES ☒ NO
- f. GW Quality parameters ☐ YES ☒ NO
Sampling frequency
- g. GW Indicator parameters ☐ YES ☒ NO
Sampling frequency
- h. GW elevation parameters YES ☒ NO
- i. Outline GW Quality Assessment Program YES ☒ NO
- j. Statistical Analysis of Indicator parameters YES ☒ NO

Results:

6. Has the facility implemented GW Quality Assessment program?

YES ☒ NO

a. Date: _____

b. Results: _____

7. Does the facility maintain the necessary records.

a. Initial background parameter concentrations

YES ☒ NO

b. Subsequent parameters concentrations

YES ☒ NO

c. Statistical evaluations

YES ☒ NO

8. Has the facility reported necessary information

YES ☒ NO

a. DW Standards for 1st year

YES ☒ NO

b. GW Indicator parameters annually

YES ☒ NO

c. Statistical evaluation

YES ☒ NO

9. Comments:

no groundwater monitoring
facility abandoned in January 1982

G. Subpart G - Closure and Post-Closure (40 CFR 265.110)

Closure

1. Has the facility developed a closure plan which outlines all necessary steps to safely close the facility? (40 CFR 265.117)
 - a. Description of how and when the facility will be partially closed (if applicable) and finally closed?
YES ☒ NO
 - b. Estimate of the maximum inventory of wastes in storage and in treatment at any time during the life of the facility?
YES ☒ NO
 - c. Description of the steps needed to decontaminate the facility equipment during closure? YES ☒ NO
 - d. Comment: *facility abandoned in January 1982,
no closure or post-closure procedures*

Post-Closure

2. Has the facility developed a post-closure plan which contains the following steps to safely care for the facility after closure/post-close of the facility? (40 CFR 265.117)
 - a. Description of how post closure will be carried out for the next 30 years. () ☒ no
 - b. Notice to the local land authority within 90 days after closure is completed? () ☒ no
 - c. Notice in deed to property? () ☒ no

H. Subpart H - Financial Requirements 40 CFR 265.140

1. Liability

- a. (1) Does facility maintain liability insurance for sudden occurrences in the amount of at least \$1 million per occurrence with an annual aggregate of at least \$2 million? YES NO

- (2) By what method did the owner/operator demonstrate sudden liability coverages to the RA? none

- (a) HW facility liability endorsement(s) ()
(b) HW facility certificate(s) of liability insurance ()
(c) financial test ()
(d) corporate guarantee ()
(e) multiple mechanisms (specify) ()

- b. (1) If a surface impoundment, landfill, or land treatment exist at the facility, does facility maintain liability insurance for nonsudden occurrence in the amount of at least \$3 million per occurrence with an annual aggregate of at least \$6 million? YES NO

- (2) By what method did the owner/operator demonstrate non-sudden liability coverage to RA? none

- (a) HW facility liability endorsement(s)' ()
(b) HW facility certificate(s) of liability insurance' ()
(c) financial test ()
(d) corporate guarantee ()
(e) multiple mehcanisms (specify) ()

- c. Has owner/operator submitted an originally signed duplicate of liability coverage demonstration to RA? *no*
- d. Is wording of liability coverage instruments identical to that specified in 40 CFR 264.151? YES ☒ NO

Comment: *facility abandoned in Jan. 1982, no financial requirements met*

2. Assurance

a. Closure

- (1) Has facility prepared a written estimate of the cost of closing the facility in accordance with the closure plan (40 CFR 265.112)? YES ☒ NO

- (2) Has this cost estimate been adjusted annually for inflation? YES ☒ NO

- (3) Has facility established financial assurance for the closure of the facility (40CFR 265.143)? YES ☒ NO

- (4) By what method has this been achieved:

- a. Trust fund ()
- b. Surety bond (with standby trust) ()
- c. Letter of credit (with standby trust) ()
- d. Insurance ()
- e. Financial test ()
- f. Corporate guarantee ()
- g. Multiple mechanisms ()

none
↓

- (5) Has facility submitted an originally signed duplicate of financial assurance to RA? YES ☒ NO

- (6) Is wording of the financial assurance statement identical to that specified in 40 CFR 264.151? YES ☒ NO

- (7) Comment:

b. Post-Closure (Disposal Facilities)

- (1) Has facility prepared a written estimate of the cost of post-closure monitoring and maintenance of the facility (40 CFR 265.144)? YES ☒ NO

- (2) Has this cost estimate been adjusted annually for inflation? YES ☒ NO

I. Subpart I Use and Management of Containers (40 CFR 265.170)

1. Does this section apply to this facility? YES NO
2. Are the containers made of or lined with materials which will not react with and are compatible with the hazardous waste to be stored in them? YES NO
unknown
3. Are the containers always closed, except to add or remove waste? YES NO
4. Are container storage areas inspected weekly for leaks and container deterioration (40 CFR 265.174)? YES NO
5. Are precautions taken to prevent accidental ignition or reaction of ignitable or reactive waste? YES NO
6. Are containers holding ignitable or reactive waste located at least 50 feet from the facility's property line? YES NO
unknown
7. Is the facility aware of and complying with the following requirements for incompatible wastes:
 - a. Incompatible wastes must not be placed in the same containers, unless in compliance with 265.17(b) YES NO
 - b. HW must not be placed in an unwashed container that previously held an incompatible waste YES NO
 - c. Are storage containers holding HW that are incompatible with any waste or other material stored nearby separated from or protected from them by means of a dike, berm, wall, or other device? YES NO
unknownExplain?
8. Are containers marked or labeled in a manner equivalent to 40 CFR 172 subpart E? YES NO
9. Comments: several containers leaking
facility abandoned in Jan. 1982

J. Subpart J - Tanks (40CFR 265.190)

1. Does this section apply to this facility? YES NO

2. Do tanks on the facility hold hazardous waste? YES NO

If so, what are their contents?

P003, P005

3. Is storage in tanks conducted such that:

a. It does not generate heat, pressure, fire, explosion or violent reaction?
(If no, explain) no precautions taken YES NO

b. It does not produce uncontrolled toxic mists, fumes, dusts, or gases?
(If no, explain) no precautions taken YES NO

c. It does not produce uncontrolled flammable fumes or gases?
no precautions taken YES NO

d. It does not damage the tank? YES NO

e. It does not threaten the environment in other ways (i.e., leaks, spills)? YES NO

Comments: several spills/leaks noted

4. Is 2 feet of freeboard maintained in uncovered tanks? YES NO NA

If no, is secondary containment used? YES NO NA

(Explain)

5. Is the tank(s) continuously fed? YES NO unknown

If yes, is there a means to stop inflow? YES NO unknown

Explain

6. Are Hazardous Waste storage tanks operated in a manner which minimizes the possibility of overfilling? YES NO

tanks are not operated

How:

Waste feed cut-off ()

Bypass system to another tank ()

High level alarm ()

Other no operating

7. Are inspections of the following conducted:
- a. Discharge control equipment?
How often? YES NO
 - b. Waste feed cut-off systems?
How often? YES NO
 - c. Data from tank monitoring equipment?
How often? YES NO
 - d. The level of waste in the tank?
How often? YES NO
 - e. The structural integrity of tank?
How often?
How are inspections conducted?
What is observed (looked for)? YES NO
 - f. The immediate area around the tank for
signs of leaks and the integrity of
secondary containment (if any)? YES NO
8. Have any tanks once used for storage of
hazardous waste been closed or their
function changed? When? *unknown*
- a. Were all hazardous wastes and/or residues
removed? *Superfund action in Sept. 1983* YES NO
 - b. What was the disposition of the wastes
or residues (i.e., where did it go)? YES NO
disposal site
 - c. When shipped? *Sept. 1983*
9. Are ignitable or reactive wastes placed in
tanks? YES NO
10. If yes, what measures are used to prevent
ignition or reaction? *none*
11. Have wastes been placed in a tank which
previously contained potentially incom-
patible waste or residue? YES NO
unknown
12. If reactive or ignitable wastes are stored
in covered tanks, are they in compliance with
the National Fire Protection Association's
buffer zone requirements? YES NO
unknown
13. Are "No Smoking" signs posted? YES NO

14. Have other measures been adopted to reduce hazards associated with storage of ignitable or reactive waste in tanks?

YES ☒ NO

Explain facility abandoned in Jan. 1982
no precautions to reduce hazards

15. Waste Analysis and Trial Tests

Before treating and storing of hazardous waste in a tank is a detailed chemical and physical analysis of the waste obtained?

YES NO *NA*

16. Does the company have and follow a written waste analysis plan?

YES ☒ NO

- a. Does the plan identify parameters used?

YES ☒ NO

Explain facility abandoned

- b. Sampling Method?

YES ☒ NO

Explain facility abandoned

- c. How frequent is analysis repeated?

YES ☒ NO

- d. Are results of waste analysis and trial tests placed in the facility's operating record.

17. Are waste analyses done when a tank is used to treat or store a HW which is substantially different or treated differently from waste previously treated or stored in the tank?

YES ☒ NO

K. Subpart K - Surface Impoundments (40 CFR 265.220)

- | | | |
|----|---|---------------|
| 1. | Does this section apply to this facility? | YES <u>NO</u> |
| 2. | Does the surface impoundment maintain enough freeboard to prevent any overtopping of the dike by overfilling, wave action, or a storm? | YES NO |
| 3. | Are the surface impoundments designed and operated to allow two feet of freeboard? | YES NO |
| 4. | Do earthen dikes have a protective cover which minimizes erosion (grass, rock, shale)? | YES NO |
| 5. | Is a waste analysis or trail test conducted whenever a surface impoundment is used to chemically treat a HW which is substantially different or treated differently from waste previously treated in the surface impoundment? | YES NO |
| 6. | Are results of waste analyses documented in the facility's operating record? | YES NO |
| 7. | Are the surface impoundments inspected on a routine basis? How often? | YES NO |
| 8. | Are ignitable or reactive wastes held in a surface impoundment (40 CFR 265.229)? | YES NO |
| 9. | Comments: | |

The following 40 CFR Subparts do not have a specific checklist prepared because few of these types of facilities exists in Region X. Inspection made at facilities which operate any of the following would require the inspector to prepare an inspection checklist prior to the site visit.

- L. Subpart L - Waste Piles (40 CFR 265.250)
- M. Subpart M - Land Treatment (40 CFR 265.270)
- N. Subpart N - Landfills (40 CFR 265.300)
- O. Subpart O - Incinerators (40 CFR 265.340)
- P. Subpart P - Thermal Treatment (40 CFR 265.370)
- Q. Subpart Q - Chemical, Physical, and Biological Treatment (40 CFR 265.400)
- R. Subpart R - Underground Injection (40 CFR 265.430)

VI. Treatment, Storage, and Disposal (TSD) Permit Regulations (40 CFR 264) (Date Revised November 21, 1983)

This Part of the checklist does not have a specific checklist prepared because the checklist would be different for each facility. A compliance inspection made at a facility which has been issued a Part B Permit needs to have checklist and/or narrative which reviews all of the requirements of the facility's Permit. This checklist and/or narrative needs to be developed by the individual inspector.

wastes have spilled and leaked on the ground
constituting disposal

To date, EPA has failed to follow up on the proposal to terminate interim status. On August 7, 1985, EPA again threatened Arrcom, Inc., with termination of interim status unless the facility:

- a. Applies for a final determination regarding the issuance of all required permits by November 8, 1985.
- b. Certifies that such facility is in compliance with all applicable groundwater monitoring and financial responsibility requirements.

In addition to the above, Arrcom, Inc., has also been the site of limited Superfund activity.

INSPECTION RESULTS:

To inspect Arrcom, Inc., as a true interim status facility, applying the requirements of 40 CFR 265, is almost totally impractical. It is hard to imagine a facility being much further out of compliance.

There is no office or individual on site with whom to review any plans or records. It is questionable whether the required plans or records (i.e., manifests, contingency plan, closure/postclosure plans, training records, financial liability requirements, etc.) even exist.

There is absolutely no indication that any type of groundwater monitoring program has ever been initiated at the site.

There are no security arrangements at the facility whatsoever. Access is directly off Highway 53 down a short drive. There is a one-eighth inch steel cable stretched across the drive. The cable is loosely wound around a guard post and may be easily removed from the post, giving complete access to the site.

None of the warning signs required by 40 CFR 265.14(c) are present.

The various tanks on site may be assumed to be completely out of compliance with 40 CFR 265, Subpart J.

INSPECTION SUMMARY:

Based on the observations made during this inspection, the facility appears to be totally out of compliance with the applicable sections of 40 CFR 265. In the opinion of this inspector, the facility also represents an immediate health hazard since access to the site is virtually unlimited.

PWS/hp/W13